

**ENTERED**

February 01, 2017

David J. Bradley, Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

DENNIS WOODWARD, §  
ROBERT LAWS, and VERNON L. §  
CROMUEL, Individually and On §  
Behalf of All Others Similarly §  
Situated, § No. 4:16-cv-03022  
§  
Plaintiffs, §  
§  
v. §  
§  
SEADRILL AMERICAS, INC., §  
§  
Defendant. §

**STIPULATION AND ORDER RE:  
CONDITIONAL CERTIFICATION AND NOTICE**

1. The parties agree to conditional certification and the issuance of notice to all nonexempt rig workers employed by Seadrill Americas, Inc. in the last three years; *provided* that such non-exempt rig worker did not receive notice and the opportunity to join the lawsuit styled *Boleware v. Seadrill Americas, Inc.*, 4:15-cv-02875.
2. The parties agree that Dennis Woodward is the class representative.
3. The parties agree that Moore & Associates is class counsel.
4. The agreed notice is attached as Exhibit A.
5. The agreed notice will be sent by mail and personal email (where known) at class counsel's expense within 10 days of the receipt of the information described in the following paragraph.

6. Seadrill Americas, Inc. will provide to class counsel within 20 days of the date of this Order the following information for each class member: (1) full name; (2) personal email address (where known); and (3) last known mailing address.

7. Potential plaintiffs will have 45 days from the date of mailing of the notice to opt-in to this case. Class counsel will provide to counsel for Seadrill Americas, Inc. a list of the individuals to whom they sent notice, including the date and the manner by which notice was provided.

8. Consent forms will be deemed filed as of their postmark date.

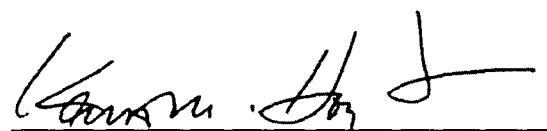
9. A reminder notice that is identical to the agreed notice will be sent to each class member 15 days prior to the end of the opt-in period by mail or personal email or both.

10. Other than the official notice, the parties will not affirmatively act to encourage or discourage participation.

11. This stipulation does not affect Seadrill Americas, Inc.'s right to seek decertification of the class or summary judgment on any issue of law or fact, and shall not be construed as an admission by Seadrill Americas, Inc. that Dennis Woodward and the members of the conditional class are "similarly situated" under 29 U.S.C. § 216(b) or that this case is appropriate for collective action treatment.

It is so ORDERED.

SIGNED on this 1<sup>st</sup> day of February, 2017.



Kenneth M. Hoyt  
United States District Judge

# **Notice to Seadrill Americas, Inc. Employees**

**If you worked as nonexempt rig worker for Seadrill Americas, Inc. ("Seadrill") at any time in the past three years, you may be able to make a claim for unpaid wages.**

Several current and/or former Seadrill employees brought a lawsuit against Seadrill for unpaid wages. If, during the last three years, you were employed by Seadrill as a nonexempt rig worker, and you did not receive notice and the opportunity to join the lawsuit styled *Boleware v. Seadrill Americas, Inc.*, 4:15-cv-02875 (the "Boleware Lawsuit"), then you can join this lawsuit by signing and returning the enclosed consent form. If you do not want to make a claim for unpaid wages, simply do nothing.

## **Why is this notice being sent?**

A United States District Judge has determined all non-exempt rig workers employed by Seadrill during the last three years, who did not receive notice and the opportunity to join the Boleware Lawsuit, should be given an opportunity to join this lawsuit. However, the court has not expressed any view as to whether any current or former employees are owed unpaid wages.

## **Why is there a lawsuit?**

The former and/or current employees in this case claim that Seadrill did not pay them for mandatory pre-shift safety meetings, weekly safety meetings, fire drills and/or shift changes as required by federal law.

Seadrill denies that it did anything wrong and that any of its employees are entitled to additional pay.

## **What happens if I join the lawsuit?**

Those who join the lawsuit must prove their claims at trial. If the court finds that you were not paid all wages owed to you, the court will award you money damages. If the court finds you were properly paid all wages owed to you, you will not be awarded any money. You will also be bound by the judgment, whether favorable or unfavorable.

The lawyers of MOORE & ASSOCIATES will be paid according to the fee contract signed by the class representative, which is available to you upon request. If you choose to be represented by MOORE & ASSOCIATES, you will not have to pay MOORE & ASSOCIATES unless you recover money from the case. The lawyers of MOORE & ASSOCIATES are also seeking to have the attorney's fees paid by Seadrill.

**Do not worry about joining this lawsuit if you are a current employee. Federal law prohibits Seadrill from taking any negative action against you because you join this lawsuit.**

**The United States District Court for the Southern District of Texas approved this notice.**

## **What if I do not join the lawsuit?**

You will not be eligible to receive any money from this lawsuit unless you join. However, you are under no obligation to join.

## **How quickly must I act to join the lawsuit?**

If you decide to join the lawsuit, you should act now. Every day that passes potentially reduces any recovery you might receive because of the law's statute of limitations. You must respond no later than [*insert date*] in order to join this lawsuit.

## **How do I join the lawsuit?**

If you want to join this lawsuit and agree to be represented by MOORE & ASSOCIATES, just complete the enclosed form and return it by mail, fax, or email to:

Attn: Seadrill OT Lawsuit  
MOORE & ASSOCIATES  
440 Louisiana Street, Suite 675  
Houston, Texas 77002  
Tel. (713) 222-6775  
Fax (713) 222-6739  
[scanner@mooreandassociates.net](mailto:scanner@mooreandassociates.net)

Please note: you are not a part of the lawsuit until you return the enclosed consent form and the form is filed by the attorney.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

DENNIS WOODWARD, §  
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All Others Similarly Situated, §

No. 4:16-cv-03022

Plaintiffs, §  
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v. §  
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JURY TRIAL DEMANDED

SEADRILL AMERICAS, INC., §  
§  
§

Defendant. §  
§  
§

**NOTICE OF CONSENT**

I consent to be a party plaintiff in this lawsuit to collect unpaid wages. I agree to be bound by the Contingent Fee Agreement between the named plaintiff(s) and MOORE & ASSOCIATES. By joining this lawsuit, I designate the named plaintiff(s) as my representative to make decisions on my behalf concerning the method and manner of conducting the lawsuit, the approval of any settlement, and all other matters pertaining to this lawsuit. I consent, agree and elect to be bound by any ruling, settlement or judgment, whether favorable or unfavorable. I also understand that while I have the right to choose other counsel and/or to pursue my claims on my own behalf, I choose to be represented by MOORE & ASSOCIATES and any other attorneys with whom they may associate, and I authorize them to pursue any claims I may have relating to unpaid wages, including such litigation as may be necessary.

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Signature

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Date Signed

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Printed Name

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Street Address

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City                    State                    Zip

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Telephone Number

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Email Address